

AN 09/913,780

Page 8

**REMARKS**

Claims 1, 47 and 82-110 are pending. Examiner has rejected claims 1, 47, 82, 87-89, 91-95 and 97-110. Examiner has further objected to claims 83, 84, 90 and 96 but indicated that they contain allowable subject matter. Applicant respectively submits that all pending claims are allowable.

**Claim Rejections - 35 U.S.C. § 103****Landsman Reference**

Before responding to specific claim rejections, it is perhaps constructive to examine the *Landsman* reference (U.S. Pat. No. 4,764,815) in some detail, as this reference has been relied upon as a primary reference in most, if not all, prior art-based claim rejections in multiple office actions. Specifically, Examiner has taken the position that *Landsman*, which uses platens to support the medium to be scanned, can be combined with references disclosing conveyer systems in which the conveyed object is in direct contact with a stationary bed to arrive at the invention claims in the present application. Applicants respectfully submits that, whether the cited secondary references discloses conveyer systems in which the conveyed object is in direct contact with a stationary bed, *Landsman* cannot be properly combined with the secondary references to make a *prima facie* case of obviousness.

A major issue *Landsman* addresses is the conflict between the need for accuracy and need for speed in advancing the scanned medium in a scanning process. One approach for achieving accuracy is to increase the size and mass of the components, thereby achieving better immunity from vibration and better stability. Col. 2, lines 4-6, *Landsman*. However, accelerating massive parts requires high forces and can result in internally developed vibrations, which adversely impacts on accuracy. *See, id.* at lines 7-12.

To resolve the conflict, one *could have* attempted in the direction of reducing the masses of moving components such as a platen carrying the scanned medium. But that was *not* the route *Landsman* took. Instead, *Landsman* chose to adopt a system with *two* platens, *i.e.*, a primary platen (30) and reference platen (32). This was done with the recognition that prior art systems had achieved poor results due to "low-cost, *light weight* construction employed to reduce mechanical acceleration and forces inherent in more massive systems."

AN 09/913,780  
Page 9

*Id.* at lines 23-26 (emphasis added). *Landsman* further recognized that "[t]his *light-weight* construction is prone to thermal and mechanical distortions which require frequent adjustment to correct for loss of precision." *Id.* at lines 26-29. It is therefore clear that *Landsman* teaches away from reducing the platen mass.

More specifically for each step of advancement of the medium, *Landsman* teaches advancing the reference platen during the time when the primary platen is stationary, *i.e.*, during the time when the scanning head is traversing to actively scanning the medium. *Id.* at col. 4, lines 1-5. The advancement can be carried out with precision because the scanning time is relatively long. *Id.* at line 5-8. The primary platen is subsequently rapidly advanced until stopped by the reference platen. Because the reference platen provides a positive mechanical control on the limit of advancement of the primary platen, there is no need for the primary platen advancing mechanism to provide positional accuracy. *Id.* at line 9-18. *Landsman* therefore provides no motivation to reduce the platen mass. To the contrary, *Landsman* provides a system that purportedly achieves high speed with a high platen mass.

#### Specific Objections

Claims 1, 88, 94, 95 and 97 had been rejected in the previous Office Action under 35 U.S.C. § 103(a) as being unpatentable over *Landsman* (U.S. Pat. No. 4,764,815) in view of *Eberhard* (U.S. Pat. No. 5,437,360). Examiner did not base any rejection on *Eberhard* in the current Office Action but has disagreed with Applicants characterization of *Eberhard*. To the extent that Examiner is maintaining any previous rejection based on *Eberhard*, Application incorporates herein the arguments made in the previous Reply regarding *Eberhard*. Applicant further respectfully submits the following.

*Eberhard* specifically teaches raising the upper surface of the belt 2 slightly above the horizontal transport plane. *See, e.g.*, col. 3, lines 14-18. The passage in *Eberhard* cited by Examiner does not teach sliding the medium on the support bed. Further, as discussed above, even if *Eberhard* taught sliding a load on the support bed, it would be improper to combine *Landsman* with *Eberhard* because there is no motivation in the prior art to modify *Landsman* in a way that reduced the mass of the platen. In fact, *Landsman* teaches away

AN 09/913,780

Page 10

from such modifications. Claims 1, 88, 94, 95 and 97 are therefore not obvious over *Eberhard*.

Claims 47, 87, 89 and 91-93 were rejected under 35 U.S.C. § 103(a) as unpatentable over *Landsman* in view of *Eberhard* and *Bergling* (U.S. Pat. No. 4,015,702). Applicant respectfully disagrees. Independent apparatus claim 47 requires "a carriage for engaging the printing plate in direct contact with the stationary support bed and sliding the printing plate on the supporting bed". Similarly, independent method claim 87 requires "disposing a printing plate on, and in direct contact with, the stationary support area." As discussed above, neither *Landsman* nor *Eberhard* teaches engaging the printing plate in direct contact with the stationary support bed. *Bergling* comes no closer. In *Bergling*, although there is a conveyor with roller wheels on it, the patent does not show the work piece being held in direct contact with the wheels. *Bergling* is silent on the position of the work piece relative to the wheels. However, *Bergling* speaks of centering the guide laterally to minimize the range of torque on the guide about the longitudinal axis of the guide. If the work piece were in direct contact with the wheels themselves, the torque would not be an issue. *Bergling* therefore does not teach maintaining the work piece on the support bed. Claims 47 and 87, as well as claims 89 and 91-93, each of which depends on either claim 47 or 87, are not obvious in light of the cited references.

#### Allowable Subject Matter

Claims 82-84, 90 and 96 were deemed to contain allowable subject matter but were objected to because they depended on rejected claims. The finding of allowable subject matter is greatly appreciated. Because Applicant believes that the base claims that the claims objected to depend on are allowable, Applicant does not believe amendment of these claims are necessary.

Applicant notes with appreciation the allowance of claims 85 and 86.

#### New Claims

Claims 98-110 have been added. They each contain at least one element not taught or suggested in the prior art and therefore should be allowable. For example, claim 98 requires

AN 09/913,780  
Page 11

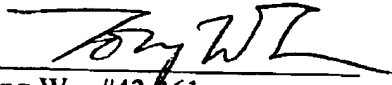
a carriage adapted to "maintain the printing plate at the level of the support plane and in direct contact with the support bed". In addition to the elements of claim 98, dependent claim 99 requires that the carriage is moveable across the support field in stepwise motion; claim 100 requires the support to be "adapted to maintain the printing plate at a precise distance from the optical head while the carriage moves the printing plate across the support field"; claim 101 requires that "the support bed is adapted to maintain the printing plate flat in the support plane"; and claim 102 requires that "the carriage is adapted to securely maintain the printing plate in a stationary position while the optical head moves and emits energy onto the printing plate." Claims 103-110 have similar limitations, respectively.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully Submitted,

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